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May 15, 1998

Mr. Lester Snow
Executive Director
CALFED/Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Significance of Bromide in Source Water

Dear Mr. Snow:

The California Urban Water Agencies (CUWA) understands that CALFED intends to convene an "experts review panel" to address the significance of bromide in Delta drinking water sources. While CUWA supports the commissioning of such a panel on this important topic, the charge of this group needs to be given careful consideration in order to provide meaningful value to the CALFED process. CUWA has already commissioned an independent science advisory panel to review treatment technology, future drinking water regulations and source water quality targets. CALFED's panel should not duplicate CUWA's expert panel, but rather focus specifically on issues that complement the CUWA work.

CUWA believes the CALFED panel should focus on the health implications of disinfection by-products (DBPs), particularly brominated species. It is our view that CALFED has seriously understated the significance of brominated DBPs in drinking water. Considerable information has been gathered in the past few years which indicates that brominated DBPs have far greater health impacts than chlorinated DBPs, such as chloroform. New findings are showing that brominated species not only have carcinogenic potential from long term exposure, but may also have acute reproductive and developmental impacts. This is critical since the bromide concentration in Delta water is higher than 90 to 95% of the utilities nationwide. Consequently, CUWA does not share CALFED's current view stated in the Phase II Interim Report that "the specific importance of bromide levels as a 'distinguishing characteristic' for the CALFED alternatives is unclear."

A good starting point for CALFED's panel would be to review CUWA's independent experts report, *Bay Delta Drinking Water Quality Criteria*, which will be available in early June of this year. A copy will be forwarded to CALFED as soon as possible. Considerable effort went into preparation of this report and previous versions received considerable review by many of the stakeholders in the CALFED process.

CUWA believes that CALFED should place a high priority on rapidly resolving the bromide issue so that meaningful planning and development can be accomplished relating to actions for significantly improving water quality. Please let us know how we can expedite this process.

Sincerely,



Byron M. Buck
Executive Director
CUWA

RLW/BB

cc: Rick Woodard, CALFED
Felicia Marcus, Region IX, EPA
Bruce Macler, Region IX, EPA
Robert Hultquist, DHS
CUWA Board of Directors